

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
X  
Plaintiff,

SHRI LAKSHMI COTSYN LTD.

-vs-

CIVIL ACTION  
Case No. 3:12-CV-01614-FLW-DEA

Defendant/ Counterclaimant

HN INTERNATIONAL GROUP, INC.  
\_\_\_\_\_X

**NOTICE OF MOTION TO DISMISS  
AND COMPEL ARBITRATION**

The Defendant moves to dismiss the action because:

1. The claims alleged herein by the Plaintiff, SHRI LAKSHMI COTSYN LTD. are subject to an arbitration provision contained in a Master Vendor Agreement.
2. Both parties signed a Master Vendor Agreement in October of 2009 in which paragraph 25 provides that “*any disagreement or dispute related to the Agreement which remains unresolved after good faith negotiation, shall be referred to and determined by arbitration*”
3. Defendant/Counterclaimant requests the matter be dismissed and the Plaintiff be compelled to arbitrate their claims pursuant to the Agreement of the parties.

Dated: June 27, 2012

/S/ Steven P. Ross  
Steven P. Ross  
Attorney for the Defendant  
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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2012 I served the foregoing Notice of Motion to Dismiss upon the following attorneys for the Plaintiff at their address as indicated below:

By Notice of Electronic Filing:

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